

ESTTA Tracking number: **ESTTA958583**

Filing date: **03/07/2019**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91233690
Party	Defendant Rusty Ralph Lemorande
Correspondence Address	RUSTY LEMORANDE 1245 NORTH CRESCENT HEIGHTS BLVD #B LOS ANGELES, CA 90046 UNITED STATES lemorande@gmail.com 323-309-6146
Submission	Stipulated/Consent Motion to Extend
Filer's Name	Rusty Lemorande
Filer's email	lemorande@gmail.com
Signature	/Rusty Lemorande/
Date	03/07/2019
Attachments	NOLD - Stipulation for 60 days March 6 2019.pdf(212382 bytes )

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Opposer

V.

# RUSTY LEMORANDE

Applicant

Applicant, Rusty Lemorande (“Lemorande”) respectfully moves the Board to suspend the above-referenced proceeding for 60 days from the date of the TTAB’s ruling on this motion, on the basis of the 1) election of counsel for Image 10 to withdraw from its representation of Opposer, 2) the outstanding discovery requests still unresolved, and 3) the possibility of depositions to be scheduled as a result of resolution of item (2).

Such 60-day period will allow Opposer time to respond to the outstanding discovery requests, for Applicant to examine the documents, and then effect depositions as necessary.

Per email (Exhibit 1) Opposer states it does not oppose this request.

For the reasons stated above, Applicant respectfully requests that the Board grant this motion to suspend proceedings for 60 days from today's date and, therefore, that the Board reset all discovery and trial deadlines.

Respectfully submitted this 6<sup>th</sup> day of March, 2019.

/Rusty Lemorande/

RUSTY LEMORANDE

1     Applicant *In Pro Per*  
2     1245 NORTH CRESCENT HEIGHTS BLVD #B  
3     LOS ANGELES, CA 90046  
4     UNITED STATES  
5     lemorande@gmail.com  
6     Phone: 323-309-6146  
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**CERTIFICATE OF SERVICE**

This is to certify that a copy of the foregoing **STIPULATION AND MOTION TO EXTEND DISCOVERY** was served on Opposer’s counsel of record in the above-captioned proceedings on March 1st, 2019, via email correspondence addressed to attorney Cecelia Dickson:  
[CDickson@webblaw.com](mailto:CDickson@webblaw.com).

/Rusty Lemorande/  
Rusty Lemorande



R.H. Lemorande <lemorande@gmail.com>

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## Request for additional time for discovery

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**Cecilia R. Dickson** <CDickson@webblaw.com>

Fri, Mar 1, 2019 at 12:27 PM

To: "R.H. Lemorande" <lemorande@gmail.com>

Cc: "Christopher P. Sherwin" <CSherwin@webblaw.com>

Dear Mr. Lemorande- Pursuant to our discussion with regard to the current opposition, we do not join in the request for additional time, but we will not oppose your request to seek additional time. Please let me know if you wish to discuss further.

Best,

Cecilia



**Cecilia R. Dickson | Attorney at Law**

The Webb Law Firm

One Gateway Center | 420 Ft. Duquesne Blvd., Suite 1200 | [Pittsburgh, PA 15222 | USA](#)

P 412.471.8815 | F 412.471.4094 | [CDickson@webblaw.com](mailto:CDickson@webblaw.com)

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